

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

**THE COMMONWEALTH OF PUERTO RICO, *et
al.***

Debtors.¹

PROMESA
Title III

Case No. 17 BK 3283-LTS
(Jointly Administered)

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO**

as representative of

**PUERTO RICO ELECTRIC POWER
AUTHORITY,**

Debtor.

PROMESA
Title III

Case No. 17 BK 4780-LTS

**MOTION TO SUBMIT CORRECTED VERSION OF SISTEMA DE RETIRO DE
LOS EMPLEADOS DE LA AUTORIDAD DE ENERGÍA ELÉCTRICA (“SREAAE”)
MOTION TO SUBMIT OPENING EXPERT REPORT OF JOSÉ ISRAEL ALAMEDA
LOZADA**

[Space intentionally left blank]

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

TO THE HONORABLE COURT

COMES NOW Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica (“SREAAEE”) as creditor and party in interest pursuant to 11 U.S.C. §1109(b), through their undersigned attorneys, and before this Honorable Court very respectfully states and prays.

1. On April 28, 2023, SREAAEE filed the *Motion to Submit Opening Expert Report of José Israel Alameda Lozada*. (ECF No. 3417 in Case No. 17-4780-LTS)
2. Due to an inadvertence during the filing, the **Annex 3** of the *Opening Expert Report of José Israel Alameda Lozada* was not included with the referenced Expert Report.
3. Thus, with this Motion, SREAAEE submits the corrected *Opening Expert Report of José Israel Alameda Lozada, Ph.D.* that includes the referenced **Annex 3**.

WHEREFORE, SREAAEE respectfully requests that the Court take notice of the above stated in this Motion.

WE HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. A courtesy copy of this Motion will be delivered to the Court by email to SwainDPRCorresp@nysd.uscourts.gov as provided in First Amended Standing Order.

In Ponce, Puerto Rico, this 1st day of May 2023.



ORTIZ MENDOZA & FARINACCI FERNÓS, LLC
Edificio Banco Cooperativo Plaza
623 Ponce de León Ave., Suite 701-B
San Juan, PR 00917-4820



BUFETE EMMANUELLI, C.S.P.
P.O. Box 10779
Ponce, Puerto Rico 00732
Tel.: 787-848-0666
Fax: 1-787-841-1435

Tel: 787-963-0404

notificaciones@bufete-emmanuelli.com

/s/Rafael A. Ortiz-Mendoza
Rafael A. Ortiz-Mendoza, Esq.
USDC-PR: 229103
rafael.ortiz.mendoza@gmail.com

Co-counsel to SREAAE

/s/Rolando Emmanuelli-Jiménez
Rolando Emmanuelli-Jiménez, Esq.
USDC: 214105
rolando@emmanuelli.law

/s/Jessica E. Méndez-Colberg
Jessica E. Méndez-Colberg, Esq.
USDC: 302108
jessica@emmanuelli.law

/s/ Zoé C. Negrón-Comas
Zoé C. Negrón-Comas, Esq.
USDC: 308702
zoe@emmanuelli.law

Co-counsel to SREAAE